| SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT<br>*ENGINEERING & COMPLIANCE DIVISION*<br>APPLICATION PROCESSING AND CALCULATIONS | PAGES<br>16 | PAGE<br>1 |
|---|---|---|
| | APPL. NO.<br>**535697** | DATE<br>04/30/12 |
| | PROCESSED BY<br>Angelita Alfonso | CHECKED BY |

# PERMIT TO CONSTRUCT

COMPANY NAME: PARAMOUNT PETROLEUM CORP
ID No. 800183

MAILING ADDRESS: 14700 Downey Ave
Paramount, CA 90745

EQUIPMENT LOCATION: 14700 Downey Ave
Paramount, CA 90745

CONTACT PERSON: June Christman
(562) 748-4704

## EQUIPMENT DESCRIPTION

Additions to the Facility Permit are noted in underlines and deletions are noted in ~~strikeouts~~.

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

| Equipment | ID No. | Connected To | RECLAIM Source Type/ Monitoring Unit | Emissions And Requirements | Conditions |
|---|---|---|---|---|---|
| **Process 8: LOADING/UNLOADING FACILITIES** | | | | | **S4.3, S31.x** |
| **System 29: ORGANIC TANK/RAIL CAR LOADING/UNLOADING FACILITY, SPUR 3** | | | | | |
| LOADING ARM, RAIL CAR, TANK CAR, SPUR 3, GASOIL, SWIVEL TYPE WITH LOADING VALVES AND DROP TUBE, 4 TOTAL; DIAMETER: 4 IN<br>A/N: ~~516447~~ 535697<br>Permit to Construct Issued: | D855 | | | | C1.43 |
| UNLOADING ARM, TANK/RAIL CAR, SPUR 3, GASOIL, CRUDE OIL, 4 TOTAL; DIAMETER: 4 IN<br>A/N: ~~516447~~ 535697<br>Permit to Construct Issued: | Dxxx | | | | |

| Equipment | ID No. | Connected To | RECLAIM Source Type/ Monitoring Unit | Emissions And Requirements | Conditions |
|---|---|---|---|---|---|
| FUGITIVE EMISSIONS,<br>MISCELLANEOUS<br>A/N: ~~516447~~ 535697<br>Permit to Construct Issued: | D856 | | | | H23.2 |

## CONDITIONS

S4.3 The following condition(s) shall apply to all affected devices listed under Section H of this system for fugitive emissions of volatile organic compounds (VOC):

The following conditions shall apply to the gas oil loading equipment only.

All valves shall be physically identified in the field with special marking that distinguish the components from BACT components.

Non-bellows seal valves and other non-valve fugitive components shall not have detectable leaks exceeding 5 ppm. A detectable leak greater than 5 ppm shall be repaired within 14 calendar days after detection of the leak.

All non-bellows seal valves shall be inspected monthly using EPA Method 21. The operator may begin quarterly inspections, upon District approval, after two consecutive monthly inspections in which only two per cent or less of non-bellows seal valves are found to have detectable leaks above 5 ppm.

The operator shall keep records of the monthly inspection (quarterly where applicable), subsequent repair, and reinspection, in a manner approved by the District. Records shall be kept and maintained for at least five years, and shall be made available to Executive Officer of his authorized representative upon request.

[**Rule 1303(b)(2)-Offset, 5-10-1996**; Rule 1303(b)(2)-Offset, 12-6-2002]
[Systems subject to this condition: Process 8, System 29]

S31.4 The following BACT requirements shall apply to VOC service fugitive components associated with the devices that are covered by application number(s) 535697 (Unloading Facility Only):

All open-ended lines shall be equipped with cap, blind flange, plug, or a second valve.

All new light liquid pumps shall utilize double seals.

All new valves in VOC service, except those specifically exempted by Rule 1173, shall be bellows seal valves, except as approved by the District, in the following applications: control valve, instrument piping/tubing, applications requiring torsional valve stem motion, applications where valve failure could pose safety hazard, retrofits/special applications with space limitations, and valves not commercially available.

All new valves and major components in VOC service as defined by Rule 1173, except those specifically exempted by Rule 1173, shall be distinctly identified from other components through their tag numbers (e.g., numbers ending in the letter "N"), and shall be noted in the records.

All new components in VOC service as defined in Rule 1173, except valves and flanges, shall be inspected quarterly using EPA Reference Method 21. All new valves and flanges in VOC service, except those specifically exempted by Rule 1173, shall be inspected monthly using EPA Reference Method 21.

If 98.0 percent or greater of the new (non-bellows seal) valves and the new flange population inspected is found to leak gaseous or liquid volatile organic compounds at a rate less than 500 ppmv for light liquid and 100 ppm for heavy liquid for two consecutive months, then the operator may change to a quarterly inspection program with the approval of the District.

The operator shall revert from quarterly to monthly inspection program if less than 98.0 percent of the new (non-bellows seal) valves and the new flange population inspected is found to leak gaseous or liquid volatile organic compounds at a rate of less than 500 ppmv for light liquid and 100 ppm for heavy liquid.

All components in VOC service a leak greater than 500 ppm for light liquid and 100 ppm for heavy liquid but less than 1,000 ppm measured as methane

above background as measured using EPA Method 21, shall be repaired within 14 days of detection. A leak greater than 1,000 ppm shall be repaired according to Rule 1173.

The operator shall keep records of the monthly inspection (quarterly where applicable), subsequent repair, and reinspection, in a manner approved by the District. Records shall be kept and maintained for at least five years, and shall be made available to Executive Officer of his authorized representative upon request.

[**Rule 1303(a)(1)-BACT, 5-10-1996**; Rule 1303(a)(1)-BACT, 12-6-2002; **Rule 1303(b)(2)-Offset, 5-10-1996**; Rule 1303(b)(2)-Offset, 12-6-2002]
[Systems subject to this condition: Process 8, System 29]

C1.43 The operator shall limit the throughput to no more than 400,000 barrel(s) in any one calendar month.

For the purpose of this condition, throughput shall be defined as amount of gas oil loaded in Tank/Rail Car Spur 3.

To comply with this condition, the operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s): Date, time and total quantity (in barrels) of gas oil that is loaded and total quantity of gas oil loaded through the loading racks during each month.

[**Rule 1303(b)(2)- Offset, 5-10-1996;** Rule 1303(b)(2)- Offset, 12-6-2002]
[Devices subject to this condition: D855]

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

| Contaminant | Rule | Rule/Subpart |
|---|---|---|
| **VOC** | District Rule | 1173 |

[**Rule 1173, 5-13-1994;** Rule 1173, 2-6-2009]
[Devices subject to this condition: D856]

## BACKGROUND

Paramount Petroleum Corporation (Paramount) operates a petroleum refinery located at 14700 Downey Avenue in the city of Paramount in the southern portion of Los Angeles County. Paramount processes crude oil into a variety of products including specialized road and roofing asphalts, diesel fuel, jet fuel, gasoline and gasoline components. Emission sources at the refinery include combustion sources (heaters, boilers, and IC engines), fugitive components (pumps, valves, flanges, compressors, drains, etc.), cooling towers, storage tanks, flares and loading/unloading facilities. The South Coast Air Quality Management District (AQMD) identification number for the facility is 800183.

Paramount is proposing to install unloading arms for crude oil and gas oil in the Tank/Rail Car Loading/Unloading Facility, Spur 3, to unload to any one of the permitted crude oil and gas oil storage tanks.

AQMD received the application package on April 24, 2012. Table 1 lists permit processing tracking information and fees.

**Table 1: Permit Administration & Application Tracking Information**

| ***Application No.*** | ***535697*** |
|---|---|
| Equipment Description | Bulk Loading, >200,000 gpd |
| Date Received | 4/24/2012 |
| Deemed Complete Date | 5/21/2012 |
| Application Type | 50: Permit to Construct |
| Application Status | 20: Class I |
| Previous Application No. | 516447, Status 26, Type 10 |
| B-CAT No. | 343104 |
| C-CAT No. | 00 |
| Fee Schedule | E |
| Fee Required | $ 5,257.06 |
| Expedited Fee | $ 2,094.60 |
| Title V Revision Fee (A/N 535711) | $1,723.07 |
| Fee Submitted | $ 12,237.19 |

## COMPLIANCE RECORD REVIEW

A review of the AQMD Compliance Database showed 33 Notices of Violation (NOV) and Notices to Comply (NC) issued to Paramount in the past five years (06/01/07 – 06/01/12). All notices are either closed or in compliance status. The Stipulated Orders for Abatement (SOFA) are closed. Paramount is on a schedule to compliance on the Variance Cases.

## PROCESS DESCRIPTION and EMISSIONS CALCULATION

Paramount's rail car loading racks are located next to tracks, or "spurs" off of the main railroad track once it enters the refinery. Some of the spurs are for storage of railcars in preparation for loading or unloading. Existing loading and unloading facilities are located in between Spur 1 and Spur 2 and next to Spur 3. Once the railcars are loaded or unloaded, they are pushed back onto the main track for shipping.

Paramount is proposing to install unloading arms for gas oil and crude oil in Spur 3. Emissions for the unloading of materials are accounted for under permits for the storage tanks to which they are unloaded. Only fugitive emissions from the unloading process are accounted for under this application. Paramount provided the number of fugitive components to be installed. The calculated fugitive emissions as tabulated in Table 2 are 1.30 lbs/day.

## Table 2: Fugitive Components Count and Emissions for Tank/Rail Car Unloading Facility, Spur 3

| Source Unit | | Service | No of Existing Components (1) | No. of New Components to be Installed (2) | Correlation Equation Factor, 500 ppm Screening Value | Pre-Modification Emissions (lbs/year) | Post Modification Emissions (lbs/year) |
|---|---|---|---|---|---|---|---|
| **Valves** | **Sealed Bellows** | **All** | | 4 | 0 | | 0.00 |
| | **SCAQMD Approved I & M Program** | **Gas / Vapor** | | | | | |
| | | **Light Liquid (3)** | | 15 | 4.55 | | 68.19 |
| | | **Heavy Liquid (4)** | | | | | |
| **Pumps** | **Sealless Type** | **Light Liquid (3)** | | | | | |
| | **Double Mechanical Seals or Equivalent Seals** | **Light Liquid (3)** | | 1 | 46.83 | | 46.83 |
| | **Single Mechanical Seals** | **Heavy Liquid (4)** | | | | | |
| **Compressors** | | **Gas / Vapor** | | | | | |
| **Flanges (ANSI 16.5-1988)** | | **Light Liquid (3)** | | 26 | 6.99 | | 181.74 |
| | | **Heavy Liquid (4)** | | | | | |
| **Connectors** | | **Light Liquid (3)** | | 50 | 2.86 | | 143.07 |
| | | **Heavy Liquid (4)** | | | | | |
| **Pressure Relief Valves** | | **All** | | | | | |
| **Process Drains with P-Trap or Seal Pot** | | **All** | | | | | |
| **Other (including fittings, hatches, sight-glasses, and meters)** | | **All** | | 4 | 9.09 | | 36.36 |
| **Total Emissions (lbs/year)** | | | | | | | 476.19 |
| **Emissions Increase (lbs/day)** | | | | | | | **1.30** |

(1) Any component existing prior to the modification.
(2) Any new component proposed to be installed due to the modification; this also includes new components to be installed to replace existing components.
(3) Light liquid and gas/liquid streams: Liquid or gas/liquid stream with a vapor pressure greater than that of kerosene (>0.1 psia @ 100°F or 689 Pa @ 38°C), based on the most volatile class present at 20% by volume.
(4) Heavy liquid: streams with a vapor pressure equal to or less than that of kerosene (<0.1 psia @ 100°F or 689 Pa @ 38°C), based on the most volatile class present at 20% by volume.

**RISK ASSESSMENT:** Tier 1: Screening Emission Levels

The Multiple Pollutant Screening Level Procedure of Tier 1 is used to determine whether or not detailed risk analysis will be required. The nearest worker and residential receptor location of 50 meters is used.

**Table 3: Screening for Carcinogenic and Chronic Compounds**

| *Toxic Air Contaminant (TAC)* | *Wt % (1)* | *VOC Increase/yr (2)* | *Qyear (3)* | *PSL (4)* | *PSI (5)* |
|---|---|---|---|---|---|
| Benzene | 0.176 | 476.19 | 0.84 | 2.99E+00 | 2.80E-01 |
| Ethyl Benzene | 0.183 | 476.19 | 0.87 | 3.44E+01 | 2.53E-02 |
| Hexane | 1.374 | 476.19 | 6.54 | 6.07E+05 | 1.08E-05 |
| Toluene | 0.533 | 476.19 | 2.54 | 2.60E+04 | 9.77E-05 |
| Xylene | 1.169 | 476.19 | 5.57 | 6.07E+04 | 9.18E-05 |
| | | | | **Σ PSI** | **3.05E-01** |

(1) Provided by Paramount, Bakken Crude Assay (included in the applicant's submittal)
(2) See Table 2 of this report (lbs/yr)
(3) Annual emissions of each TAC (Qyear), lbs/yr
(4) Pollutant Screening Level (PSL), as contained in Table 1A of Attachment L, Risk Assessment Procedures, Version 7.0 (Revised September 10, 2010)
(5) Pollutant Screening Index = Q/PSL

**Table 4: Screening for Acute Compounds**

| *Toxic Air Contaminant (TAC)* | *Wt % (1)* | *Total VOC Emissions/hr (2)* | *Qhr (3)* | *PSL (4)* | *PSI (5)* |
|---|---|---|---|---|---|
| Benzene | 0.176 | 0.054 | 9.59E-05 | 1.48E+00 | 6.48E-05 |
| Toluene | 0.533 | 0.054 | 2.90E-05 | 3.70E+01 | 7.84E-06 |
| Xylene | 1.169 | 0.054 | 6.36E-04 | 2.20E+01 | 2.89E-05 |
| | | | | **Σ PSI** | **1.02E-04** |

(1) Provided by Paramount, Bakken Crude Assay (included in the applicant's submittal)
(2) See Table 2 of this report (lbs/day divided by 24)
(3) Total hourly emissions of each TAC (Qhour), lbs/hr

(4) Pollutant Screening Level (PSL), as contained in Table 1A of Attachment L, Risk Assessment Procedures, Version 7.0 (Revised September 10, 2010)
(5) Pollutant Screening Index = Q/PSL

Both the cumulative cancer/chronic risk and cumulative acute risk are well below 1; therefore no further risk screening assessment is required. It is noted here that a Tier 2 MICR analysis was also conducted by Paramount using the Lynwood station, a residential and worker receptor distance of 50 meters, and a point source operating 24 hours/day, 365 days/yr. The calculations show a worker MICR of $1.77 \times 10^{-9}$ and a residential MICR of $9.07 \times 10^{-9}$.

## RULES EVALUATION

### PART 1: SCAQMD REGULATIONS

**Rule 212** Standards for Approving and Issuing Public Notice (Amended Nov 14, 1997)
This rule requires public noticing for a modification or a new source located within 1000 feet of a school, if the project results in an increase in toxic air contaminant emissions resulting in exposure to a Maximum Individual Cancer Risk (MICR) of $1x10^{-6}$ or greater during a lifetime (70 years), or if the project results in an emissions increase exceeding limits stated in Rule 212(g). The equipment is not within 1000 feet of a school (refinery map showing the location of the project is included in the applicant's submittal), the increase in MICR associated with the project is less than $1x10^{-6}$, and the project is not expected to result in an increase in criteria pollutant emissions exceeding limits stated in section 212(g). Therefore, public notice will not be required and compliance with Rule 212 is assured.

**Rule 401** Visible Emissions (Amended Nov. 9, 2001)
Operation of the Tank/Rail Car Loading and Unloading, Spur 3 facility is not expected to result in visible emissions. Therefore, compliance with this rule is expected.

**Rule 402** Nuisance (Adopted May 7, 1976)
Operation of the Tank/Rail Car Loading and Unloading, Spur 3 facility is not expected to result in a public nuisance. Therefore, compliance with this rule is expected.

**Rule 462** Organic Liquid Loading (Amended May 14, 1999)
This rule is intended to control emissions of volatile organic compounds from facilities that load organic liquids with a vapor pressure of 1.5 psia or greater under actual loading conditions into any tank truck, trailers or railroad tank car. Since

only unloading operations are proposed to be modified, this rule does not apply.

**Reg IX** Standards of Performance for New Stationary Sources (Amended March 5, 2010)

40 CFR 60 Subpart GGGa: Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006

§60.590a Applicability and designation of affected facility

This regulation is applicable to affected facilities in refineries that begin construction after November 7, 2006. The following are affected facilities under this subpart:

- Compressors
- The group of all equipment within a process unit

As per §60.591a, the definition of "Process Unit" includes product transfer racks; however, this definition has been stayed until further notice and the definition of "Process Unit" shown in §60.590a(e) governs. Process unit is defined in §60.590a(e) as components assembled to produce intermediate or final products from petroleum, unfinished petroleum derivatives, or other intermediates; a process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the product. This definition makes no mention of product transfer racks, so this subpart does not apply to the components associated with the loading and unloading process.

**Reg X** National Emission Standards for Hazardous Air Pollutants (Amended April 4, 2008)

There are currently no NESHAP standards that apply to the tank/rail car loading and unloading facility as outlined in the District's Regulation X.

**Reg XI** Source Specific Standards

Rule 1173: Fugitive Emissions of Volatile Organic Compound (Amended February 6, 2009)

The fugitive components of the tank/rail car loading/unloading facility are subject to this rule. With proper implementation of the applicant's extensive inspection program, no violation is expected. The facility submits Rule 1173 Quarterly Report to the SCAQMD.

**Reg XIII** New Source Review (NSR)

Rule 1303: Requirements (Amended Dec. 6, 2002)

This rule allows the Executive Officer to deny a Permit to Construct for any new, modified or relocated source which results in an emission increase of any non-attainment air contaminant, any ozone depleting compound, or ammonia, unless BACT is used. This rule also requires modeling and offset (among other requirements) if there is a net increase in any non-attainment air contaminants for any new or modified source.

1303(a)(1) Best Available Control Technology (BACT)

BACT is required for any increase in emissions that exceeds 1.0 lb/day on a maximum daily basis. As discussed in the Emissions Calculation Section of this evaluation, there will be an increase of 1.30 lbs/day in fugitive VOC emissions. The use of bellow-sealed valves and compliance with Rule 1173 are BACT for fugitive components. Paramount will install BACT fugitive components and will continue to comply with the requirements of Rule 1173. Compliance is expected.

Note that according to rule interpretation from Kurt Wiese on August 1, 2006, BACT applies only to the equipment being modified. Thus, BACT is evaluated for the fugitive components only that will be installed in the unloading facility and not the entire permit unit.

1303(b)(1) Modeling

According to Rule 1303 Appendix A, modeling for VOC is not required.

1303(b)(2) Emission Offsets

Offsets are required according to District policy if project emission increases, including sum of all emission increases from all applications for that project are more than 0.5 lb/day for all non-attainment air contaminant and their precursors (excludes CO). Offset ratios shall be 1.2 to 1.0 for Emission Reduction Credits (ERC). As shown in Table 4, there is a 1.30 lbs/day increase in VOC emissions. Paramount will provide ERC in the amount of 2 lbs/day (1.30 x 1.2 = 1.56~2.0).

1303(b)(3) Sensitive Zone Requirements

The facility is located in Zone 1. Therefore, emission reduction credits will be obtained from the same Zone 1. Compliance with this requirement is expected.

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1303(b)(4) Facility Compliance

The facility is in compliance with all applicable rules and regulations of the District.

1303(b)(5) Major Polluting Facilities

(A) Alternative Analysis: The facility must conduct an analysis of alternative sites, sizes, production processes, and environmental control techniques for such proposed source and demonstrate that the benefits of the proposed project outweigh the environmental and social costs associated with the project. Paramount complies with this requirement through 1303(b)(5)(D)(i).

(B) Statewide Compliance: The facility must demonstrate that all major stationary sources, as defined in the jurisdiction where the facilities are located, that are owned or operated by the facility in the State of California are subject to emission limitations and are in compliance or on a schedule for compliance with all applicable emission limitations and standards under the Clean Air Act. Paramount complies with this requirement by certification.

(C) Protection of Visibility: This requirement does not apply since there is no increase in PM or NOx emissions.

(D) Compliance Through California Environmental Quality Act: The CEQA Applicability Form (400-CEQA) submitted by Paramount indicates that the project does not have any impacts which trigger the preparation of a CEQA document; therefore a CEQA analysis is not required.

**Reg XIV** Toxics and Other Non-Criteria Pollutants

Rule 1401: New Source Review of Toxic Air Contaminants (Amended September 10, 2010)

This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units,

relocations or modifications to existing permit units which emit toxic air contaminants listed in Table 1 of this rule.

1401(d)(1) MICR and Cancer Burden

The cumulative increase in MICR shall not result in an increased MICR greater than one in one million, if the permit is constructed without T-BACT and greater than ten in one million if the permit unit is constructed with T-BACT. As shown in the Risk Assessment, MICR is very well below the specified limit.

1401(d)(2) Chronic Hazard Index

The cumulative increase in total chronic HI for any target organ system shall not exceed 1.0 at any receptor location. As shown in the Risk Assessment, Table 5, chronic hazard index is very well below the specified limit.

1401(d)(3) Acute Hazard Index

The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location. The total emissions shall be calculated according to 1401(f)(4) based on maximum hourly basis from permit conditions which directly limit the emissions. As shown in the Risk Assessment, Table 6, acute hazard index is very well below the specified limit.

1401(d)(4) Risk Per Year

The risk per year shall not exceed 1/70 of the maximum allowable risk specified in (d)(1)(A) or (d)(1)(B). Since the MICR is less than 1 in a million, the facility complies with this requirement.

1401(d)(5) Operating conditions imposed pursuant to Rule 1401, which prohibit or limit the use or emission of toxic air contaminants, shall apply only to those toxic air contaminants listed in the version of Rule 1401 applicable at the time the permit conditions were imposed. There is no permit conditions prohibiting or limiting the use of toxic air contaminants for the unloading facility.

1401(d)(6) Federal New Source Review for Toxics

Section 112 of the federal Clean Air Act (CAA) defines major source as any stationary source or group of stationary sources located within a contiguous area and under common control that

emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant (HAP) or 25 tons per year or more of any combination of hazardous air pollutants (HAPs). Since Paramount does not emit more than 10 tons annually of a listed HAP or more than 25 tons annually of a combination of HAPs, it is not subject to this requirement.

**Reg XVII** Prevention of Significant Deterioration (PSD)

This regulation sets forth preconstruction review requirements for stationary sources to ensure that air quality in clean air areas does not significantly deteriorate while maintaining a margin for future industrial growth.

The SCAQMD is presently considered in attainment for the following criteria pollutants: $NO_2$, $SO_2$, CO and Lead; thus these pollutants are subject to PSD regulations.

According to the guidance provided in Mohsen Nazemi's email dated August 14, 2007, the AQMD has signed a new Limited PSD Delegation agreement with EPA effective July 25, 2007. Therefore, effective July 25, 2007, the AQMD has PSD responsibility for all new PSD sources and all modifications to existing PSD sources where the applicant is requesting to use the existing Regulation XVII to determine PSD applicability for a modification and not the recent calculation methodology adopted by the EPA as part of the NSR Reform.

The requirements of this regulation are not applicable for the proposed changes covered in this engineering evaluation since there is no net increase in annual emissions of any of the attainment air contaminant.

**Reg XX** Regional Clean Air Incentives Market (RECLAIM)

There are no NOx or SOx emissions associated with the Tank/Rail Car Loading and Unloading, Spur 3 facility; therefore, this regulation does not apply.

**Reg XXX** Title V Permits

Rule 3005: Permit Revisions (Amended March 16, 2001)

The permit for this project will be issued as a "de minimis significant permit revision" of the Title V permit as defined in Rule 3000(b)(6), because the cumulative emission increase is not greater than the following threshold:

| **Air Contaminant** | **Daily Maximum in lbs/day** |
|---|---|
| HAP | 30 |
| Volatile Organic Compounds | 30 |
| Nitrogen Oxides | 40 |
| PM10 | 30 |
| Sulfur Dioxide | 60 |
| Carbon Monoxide | 220 |

The table below shows that the cumulative emission increase is not greater than the threshold; therefore the requirements of this rule have been met. The revision will be applicable to a 45-day EPA review.

**Table 5: De Minimis Emissions Accumulation for Paramount Refinery**
(Initial Title V Issuance to Latest Revision, March 19, 2009 - June 1, 2012)

| *Air Contaminant* | *Current, lbs/day* | *Additional due to this project, lbs/day* | *Total, lbs/day* |
|---|---|---|---|
| HAP | 0.00 | 0.00 | 0.00 |
| VOC | ***0.42*** | ***1.30*** | ***1.72*** |
| NOx | 0.59 | 0.00 | 0.59 |
| PM10 | 0.02 | 0.00 | 0.02 |
| SOx | 0.03 | 0.00 | 0.03 |
| CO | 0.50 | 0.00 | 0.50 |

Rule 3006: Public Participation (Amended November 14, 1997)
Since the permit for this project will be issued as a "de minimis significant permit revision" of the Title V permit, it will not be subject to public notice requirements of this rule.

## PART 2: STATE REGULATIONS

**CEQA** California Environmental Quality Act
CEQA requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid or eliminate identified significant adverse impacts of these projects be considered. The CEQA Applicability Form (400-CEQA) submitted by Paramount indicates that the project does not have any impacts which trigger the preparation of a CEQA document; therefore a CEQA analysis is not required.

## PART 3: FEDERAL REGULATIONS

**40 CFR 63** Subpart BBBBBB: Emissions Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Subpart BBBBBB establishes national emission and operating limitations for HAP emitted from gasoline loading activities at an area source of HAP emissions. Since the product to be loaded is not gasoline, this subpart does not apply. It is noted here that Paramount has provided data to the District to show that Paramount Refinery is an area source of HAPs (not major source) which is defined as a source emitting less than 10 tons per year of any single HAP or less than 25 tpy of all HAPs combined.

**Note:** Federal Rule 40CFR60 Subpart GGGa applicability is evaluated under Regulation IX above.

## CONCLUSION AND RECOMMENDATION

The operation of the Tank/Rail Car Loading and Unloading, Spur 3 facility is expected to comply with all applicable District, State and Federal Rules and Regulations. Therefore, issuance of Permit to Construct is recommended.